BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

Experimental Rate and Service Changes To Implement Negotiated Service Agreement With Capital One Services, Inc.	Docket No. MC2002-2

**NEWSPAPER ASSOCIATION OF AMERICA
INTERROGATORIES TO
UNITED STATES POSTAL SERVICE WITNESS JAMES D. WILSON
(NAA/USPS-T4-1-10)**
October 25, 2002

The Newspaper Association of America hereby submits the attached

interrogatories to United States Postal Service witness James D. Wilson (USPS-T-4)

and respectfully requests a timely and full response under oath.

Respectfully submitted,

NEWSPAPER ASSOCIATION OF AMERICA

By: _____

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CERTIFICATE OF SERVICE

I hereby certify that I have this date served the instant document in accordance
with section 12 of the Rules of Practice and the Presiding Officer's rulings.

_____

October 25, 2002   William B. Baker

NAA/USPS-T4-1:   Please refer to Page 6, lines 1 through 8, of your testimony and USPS Publication 8 "Address Change Service" (pages 6-7). By what technology (*e.g.*, e-mail, discs, accessible databases) will electronic ECS notifications be provided to Capital One under the NSA?

NAA/USPS-T4-2:   Please refer to Page 7, line 4, of your testimony, where you provide your estimate that, in FY2003, "85 percent of mail bearing an ACS endorsement, including the CSR, Option 2 endorsement, will receive electronic notification."   Please confirm that your statement applies only to UAA mail.

NAA/USPS-T4-3:   Under the NSA, will electronic notification will be provided to Capital One in all instances of UAA other than the types of circumstances summarized at Page 6, lines 12-25, of your testimony?

NAA/USPS-T4-4:   Do you have any reason to believe that, in Fiscal Year 2003, the percentage of Capital One First-Class solicitation mail that bears an ACS endorsement and that receives electronic notification will be other than 85 percent? If you believe that the percentage will be other than 85 percent, please provide the basis for that belief.

NAA/USPS-T4-5:   Please confirm that Capital One First-Class solicitation mail that is returned to Capital One under the proposed NSA will receive processing above the level of processing they would receive without the ACS endorsement (for example, the manual application by the carrier of "Deceased" when the recipient is deceased). If you do not confirm, please explain.

NAA/USPS-T4-6:   If your answer to NAA/USPS-T4-4 is confirmed, please estimate the percent of Capital One's FY2003 First-Class solicitation mail that will receive this additional level of processing.

NAA/USPS-T4-7:   Please confirm that Capital One First-Class solicitation mail that is forwarded currently, as a feature of First-Class service, will continue to be forwarded under the terms of the NSA. If you cannot confirm, please explain why not.

NAA/USPS-T4-8:   If you confirm NAA/USPS-T4-6, please confirm that this forwarded mail:

a.   Does not currently receive ACS; and

b.   Will receive electronic ACS under the terms of the NSA.

If you cannot confirm (a) or (b), please explain why not.

NAA/USPS-T4-9:   Please refer to your response to OCA/USPS-T4-6. Please describe the circumstances in which First-Class Mail would be either returned or forwarded through the Computerized Forwarding System, and the circumstances in which forwarded or returned First-Class Mail would not use the Computerized Forwarding System.

NAA/USPS-T4-10:   Do you expect that Capital One mail under the NSA would be returned or forwarded through the Computerized Forwarding System?